

**ORIGINAL**

**NEW APPLICATION**

WILKINSON) BARKER) KNAUER) LLP

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2010 MAY -5 P 4: 34

May 4, 2010

AZ CORP COMMISSION  
DOCKET CONTROL



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Arizona Corporation Commission  
Attn: Docket Control  
1200 West Washington Street, Room 108  
Phoenix, AZ 85007

T-04202A-10-0174

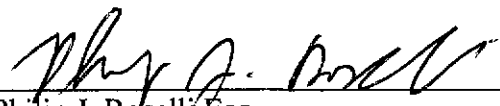
Dear Sir/Madam:

Please find enclosed for filing an original and 13 copies of Syniverse Networks, Inc's Request to Surrender its Certificate of Convenience and Necessity (Granted in Docket No. T-04202A-04-0362). Because Docket No. T-04202A-04-0362 was administratively closed in 2004, our understanding is that this filing will result in a new docket being opened, but we nonetheless provide the prior docket reference for your convenience.

I am enclosing an additional 14<sup>th</sup> copy of the filing, along with a self-addressed stamped envelope, and would ask that you return a file-stamped copy of the filing.

Please let me know if you have any questions or need any additional information.


Sincerely,

  
Philip J. Roselli Esq.  
[proselli@wbklaw.com](mailto:proselli@wbklaw.com)  
303-626-2321

Arizona Corporation Commission

**DOCKETED**

MAY -5 2010

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ARIZONA CORPORATION COMMISSION  
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Arizona Corporation Commission  
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MAY - 5 2010

Steven M. Olea, Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington St.  
Phoenix, AZ 85007

T-04202A-10-0174

DOCKETED BY

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Re: *Syniverse Networks, Inc. d/b/a Syniverse Technologies, Inc., Request to Surrender its Certificate of Convenience and Necessity (Granted in Docket No. T-04202A-04-0362)*

Dear Mr. Olea:

This firm represents Syniverse Networks, Inc., d/b/a Syniverse Technologies, Inc. ("Syniverse"), and has been authorized to make this letter filing, whereby Syniverse surrenders to the Commission its Certificate of Convenience and Necessity ("Certificate") to provide resold local exchange telecommunications services as a switchless reseller. The Certificate was granted to Syniverse by the Commission on December 18, 2003, in Decision No. 66638.<sup>1</sup> With this application, Syniverse also requests cancellation of all tariffs it has on file with the Commission.

Syniverse's request to surrender its Certificate is based on Syniverse's business decision that it no longer intends to offer resold local exchange telecommunications services in the State of Arizona. Syniverse does not currently provide, nor has it ever provided, resold telecommunications service to any customer in Arizona, and Syniverse has never collected advances, deposits, or prepayments from any customer in Arizona. As a result, Syniverse's surrender of its Certificate and the cancellation of its tariff will not affect any customer. Syniverse therefore respectfully requests that the Commission waive the notice, refund and other abandonment requirements of Arizona Administrative Code R14-2-1107(A)(2)-(4) and (B).<sup>2</sup>

<sup>1</sup> The Certificate was originally granted to TSI Telecommunication Network Services, Inc. ("TSI"). On May 12, 2004, in Docket No. T-04202A-04-0362 ("Name Change Docket"), TSI filed a Notice of Corporate Name Change, to Syniverse Networks, Inc. On July 12, 2004, Commission Staff filed a letter in the Name Change Docket indicating that the tariffs reflecting the change of TSI's name to Syniverse became effective by operation of law on June 9, 2004, and directed Docket Control to administratively close the docket. On July 20, 2004, the Commission's Docket Control Division administratively closed Docket No. T-04202A-04-0362.

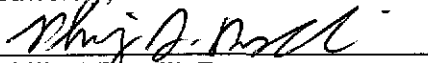
<sup>2</sup> See, e.g., A.C.C. Decision No. 70948, at 3 (2009) ("A.A.C. R14-2-1107(A)(2) and (4) and (B) do not apply to GTC as to its CC&N to provide competitive resold local exchange telecommunications services because GTC has never provided resold local exchange telecommunications services in Arizona."); A.C.C. Decision No. 70163, ¶ 14 (waiving the notice requirements of A.A.C. R14-2-1107 where a reseller of telecommunications services "had no customers to notify of the [abandonment] Application, of the cessation of business in Arizona, or to whom to provide a list of alternative providers.").

In order to expedite the abandonment process, Syniverse submits the following, additional information to the Commission regarding the abandonment of its Certificate and the cancellation of its tariff:

- Pursuant to Decision No. 68068 in Docket No. T-04202A-03-0612, the Commission waived the requirement that Syniverse obtain a \$25,000 performance bond as a condition of operation. Thus, Syniverse does not have a currently effective performance bond in Arizona.
- Based on its request for a waiver of A.A.C. R14-2-1107(A)(2)-(4) and (B) in this application, Syniverse has not provided any legal notices of this cancellation to any counties or customers. Syniverse has never had any customers of resold local exchange services in Arizona, and thus there is no one to notify regarding the surrender of its Certificate. Moreover, no customers have been transferred to other telecommunications carriers and there is no reasonable basis for Syniverse to have a plan in place for the refund of customer deposits.
- There are no Syniverse affiliates that are currently offering telecommunications services in Arizona.
- Syniverse does not have any employees in Arizona, including management, technical, or customer service personnel.
- Syniverse has no facilities located in Arizona.
- Syniverse has never provided service pursuant to its Arizona Certificate.

Should any further information be required prior to cancellation of the Certificate and the tariff, please do not hesitate to contact me at the address below.

Sincerely,



Philip J. Roselli, Esq.  
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Counsel for Syniverse